

## **Annexure 13: Scoping Phase: Written Comments**

## **Annexure 14: Comment and Response Report**

# ENVIRONMENTAL AUTHORISATIONS FOR THE PROPOSED NEW TAILINGS STORAGE FACILITIES (TD8 AND TD9) AND ASSOCIATED INFRASTRUCTURE AT LONMIN'S WESTERN PLATINUM MINE AND EASTERN PLATINUM MINE, NORTHWEST PROVINCE

COMMENT AND RESPONSE REPORT (accompanying  
the Draft Scoping Report)

Report Prepared for

**LONMIN**



Report Prepared by

 **srk** consulting

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# **Environmental Authorisation for the proposed new Tailings Storage Facilities (TD8 and TD9) and associated infrastructure at Lonmin's Western Platinum and Eastern Platinum Mines, North West Province**

## **Comment and Response Report (accompanying the Draft Scoping Report)**

### **Lonmin**

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## Disclaimer

The opinions expressed in this Report have been based on the information supplied to SRK Consulting (South Africa) (Pty) Ltd (SRK) by Lonmin. The opinions in this Report are provided in response to a specific request from Lonmin to do so. SRK has exercised all due care in reviewing the supplied information. Whilst SRK has compared key supplied data with expected values, the accuracy of the results and conclusions from the review are entirely reliant on the accuracy and completeness of the supplied data. SRK does not accept responsibility for any errors or omissions in the supplied information and does not accept any consequential liability arising from commercial decisions or actions resulting from them. Opinions presented in this report apply to the site conditions and features as they existed at the time of SRK's investigations, and those reasonably foreseeable. These opinions do not necessarily apply to conditions and features that may arise after the date of this Report, about which SRK had no prior knowledge nor had the opportunity to evaluate.

## List of Abbreviations

BID	Background Information Document
CRR	Comment and Response Report
DEDECT	Department of Economic Development, Environment, Conservation and Tourism
DMR	Department of Mineral Resources
DSR	Draft Scoping Report
DWA	Department of Water Affairs
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMP	Environmental Management Programme
EMPR	Environmental Management Programme Report
FSR	Final Scoping Report
I&AP	Interested and Affected Party
IDP	Integrated Development Plan
IWULA	Integrated Water Use License Application
Lonmin	Lonmin Platinum Mine
MPRDA	Mineral and Petroleum Resources Development Act
NEMA	National Environmental Management Act (Act No. 107 of 1998)
NWA	National Water Act (Act No. 36 of 1998)
WULA	Water Use License Application



# 1 Purpose of Report

Lonmin Platinum Mine's (Lonmin) Western Platinum Limited (WPL) and Eastern Platinum Limited (EPL) operations are located near Marikana in the North West Province. As a result of limited storage capacity at the central area operations, Lonmin proposes to construct two new tailings dams in order to ensure that adequate storage is available for life of mine within the central area. This will also include the construction of associated infrastructure such as pipelines, pump stations, service roads and the upgrade and extension of the current return water dam.

Lonmin has an approved Environmental Management Programme (EMP) as required by the Mineral and Petroleum Resources Development Act (Act No 28 of 2002) (MPRDA) for both WPL and EPL. Before Lonmin can commence with the proposed project, the following environmental authorisation applications need to be undertaken:

- An Environmental Impact Assessment (EIA) in terms of the National Environmental Management Act (Act No. 107 of 1998) (NEMA), Regulations 544, 545 and 546 (Government Gazette 33306, 18 June 2010);
- An EMP Amendment in terms of the MPRDA and
- An Integrated Water Use License (IWUL) Amendment - in terms of the National Water Act (Act No. 36 of 1998) (NWA).

This Comment and Response Report (CRR) represents all the comments and issues received from stakeholders throughout the Scoping Phase thus far and accompany the Draft Scoping Report

During the Scoping Phase several meetings will be held with local communities and key stakeholders to obtain comment on the proposed project and all the issues and comments raised to date were captured in this CRR. Table 1 provides a list of all the stakeholder meetings that took place to date.

**Table 1 Details of key stakeholder meetings held to date during the Scoping phase**

Date	Venue	Key stakeholder group
11 March 2013	Bapo Ba Mogale Traditional Authority(BBMTA) Offices, Bapong	Bapo Ba Mogale Traditional Authority Administrator and Project Manager
14 March 2013	Lonmin Community Centre, Mooinooi	Ward Councillors and Madibeng and Rustenburg Local Municipality Officials
15 March 2013	Segwaelane Community Hall	BBMTA Segwaelane Sub Council
19 March 2013	Bojanala Platinum District Municipality, Rustenburg	MMC for Local Economic Development and officials
19 March 2013	Wonderkop Hall	BBMTA Wonderkop Sub Council, Wonderkop Land Claims Committee

## 2 Comment and Response Report

This section includes all comments received and issues raised during the Scoping Phase to date and are captured in Comment and Response Report format. These comments have been categorised and responses were provided by Lonmin.

To date 50 comments have been received and categorised as follows:

- Air quality
- Company conduct and policy
- EIA process
- Groundwater
- Health, safety and security
- Mining rights
- Project specific issues
- Socio-economic
- Stakeholder engagement
- Township expansion

Stakeholder consultation is an ongoing process throughout the Environmental Impact Assessment (EIA) and more issues are expected as the environmental authorisation process progresses.

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
<b>2.1 Air quality</b>							
1	Lonmin explained that they are monitoring the dust in the area. Why are they not sharing the information and what are they doing to address the dust with communities?	Magdonia Masuku	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	Dust fallout monitoring data is presented for discussion at the 6 monthly Environmental Stakeholder forum meetings as held by Lonmin. The Environmental Stakeholder Forum includes representatives of Lonmin, communities, landowners/lawful occupiers, local authorities, NGOs, community-based organisations, youth groups, labour unions and conservation organisations, Dust fallout data will be presented as a component of the reports as generated by this project, Activities at Lonmin which have the potential to generate dust are identified and form part of the accredited environmental management system (ISO 14001). Where feasible and practicable mitigation measures have been put into place to reduce the potential impact. Detail on the current sources and relevant mitigation measures undertaken at Lonmin will be outlined and presented during this project in addition to the proposed mitigation measures on the proposed project.	Air quality
2	What will Lonmin do to minimise the impact of dust on our communities? People are coughing as a result of the bad air quality in the area.	Magdonia Masuku	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	Activities at Lonmin which have the potential to generate dust are identified and form part of the accredited environmental management system (ISO 14001). Where feasible and practicable mitigation measures have been put into place to reduce the potential impact. Detail on the current sources and relevant mitigation measures undertaken at Lonmin will be outlined and presented during this project in addition to the proposed mitigation measures on the proposed project.	Air quality

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						<p>The potential for dust generation as a result of the proposed activity will be assessed by the air quality impact assessment as a component of the EIA.</p> <p>Ambient air quality is determined by the cumulative impact of a variety sources and the meteorological conditions prevalent. A variety of sources influence the air quality for the North West Province. It is for this reason that the Local and Provincial air quality management plans are in place to address all sources affecting the ambient environment (i.e. domestic fuel burning, vehicle emissions, industry, and mining).</p>	
3	Lonmin explained that they use sprinklers to suppress the dust on TD6 but we doubt the existence of the sprinklers and the system. How will Lonmin ensure that this is done more effectively on the new proposed tailings dams?	Magdonia Masuku	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	<p>Lonmin's performance and efficiency of dust suppression mitigation measures on all our tailings dams, as committed to in the approved EMPs, are externally audited every two years as required in terms of Regulation 55 of and the MPRDA, 2002. These performance reports are submitted to the regulating authority for acceptance.. Lonmin has installed a Pod irrigation system on TD6 and undertakes regular spraying of environmentally friendly chemical dust suppressants to mitigate dust. In addition to this Lonmin has retained its accreditation to the ISO 14001 EMS; within which the measures as required to be installed on TD6 are outlined and reviewed to ensure continual improvement.</p> <p>Lonmin has in the past, upon stakeholder request undertaken site visits. A site visit can be arranged upon request.</p>	Air quality

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
<b>2.2 Company conduct and policy</b>							
4	The planning and roll out of this proposed project must be done in such a manner that it does not damage the environment. How will Lonmin ensure that this happens without damaging the environment?	Khoabane Mofokeng	Bojanala Platinum District Municipality (BPDM) – Rural Development and Agriculture	19 March 2013	Focus group meeting with BPDM	South African environmental legislation is very progressive in focusing first on the prevention of impacts, minimisation and then managing environmental impacts. Lonmin must comply with all applicable environmental legislation. The legal process currently being undertaken in developing the EIA and Environmental Management Programme (EMP) identify and determine the significance of potential impacts to inform how Lonmin will manage these impacts in the EMP. In addition, Lonmin has been invited to serve as a member on the International Council for Mining and Metals where international policy statements in mitigating and managing environmental impacts are adopted. Lonmin is also a member of the Chamber of Mines where standards to adopt and maintain good mining practice are adhered to. The legislative norms and international good practice are embedded within Lonmin's Charter and value system where we commit to zero harm to people and the environment. This is rolled out in their Safety and Sustainability Policy and the Sustainability Standards. This in turn is then actioned by business through their ISO14001 Systems.	Company conduct and policy
5	How does Lonmin ensure that school children understand what happens at the mine and this project in particular?	Khoabane Mofokeng	BPDM Rural Development and Agriculture	19 March 2013	Focus group meeting with BPDM	<p>Lonmin has a dedicated Community Development Section that focusses on the following matters below.</p> <ul style="list-style-type: none"> <li>Lonmin hosts selected learners from our GLC communities for mine visits during the year.</li> </ul>	Company conduct and policy

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						<ul style="list-style-type: none"> <li>• We use various media and stakeholder engagement platforms to share what is happening at the mine (eg. Principals meetings, GLC Voice, Meetings with municipalities)</li> <li>• We hold monthly meetings with all the ward councillors from the 9 wards around the operations</li> <li>• Lonmin also conducts Mining Related Skills Programmes for selected community members – these include, but are not limited to : Competent B Training, Blaster Assistant Training, Rockdrill Operator Training</li> <li>• Lonmin offers national N1 and N2 electrical / mechanical / both training for selected learners (in 2013, we have 58 community learners on this programme) so that they may apply for learnership opportunities</li> <li>• Lonmin offers 18.2 electrical and mechanical learnership opportunities to community members</li> <li>• Lonmin provides technology support and workshops to all high schools in the GLC</li> </ul> <p>With reference to this project, project documentation has been sent out to schools in the GLC. Lonmin continues to engage with the GLC and relevant schools on various aspects of relevance. Should anyone wish to contact Lonmin on the above</p>	

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						mentioned projects please speak to Christell Clark : 014 571-4206	
6	How long has Lonmin been operational in this area? When Lonmin started how did they engage with the communities? What is the process that Lonmin went through to establish these tailings dams in the area?	Stephan Makaboge	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	Lonmin has been operational in the area since 1973. The process to establish a mine and associated infrastructure in terms of the old order legislation (Mines and Works Act 27 of 1956 and the Minerals Act 50 of 1991) focused on surface rehabilitation and has since evolved and became very progressive in the current processes outlined in all applicable environmental legislation i.e. the MPRDA and its supporting Regulations and the Mine Health and Safety Act, 1996, the National Environmental Management Act, 1998 and the National water Act, 1998. In line with the Environmental Right in the Constitution, all the current environmental legislation (including the MPRDA) requires consultation with interested and affected parties which include communities. It is possible that Lonmin did not engage with such parties previously since it was not a legal requirement then in order to obtain a mining license.	Company conduct and policy
7	There is drilling happening in the area. Why has there been no consultation in this regard with the Wonderkop Sub Council?	Stephan Makaboge	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	Lonmin indicates that the drilling are not related to the TD8, TD9 and associated Infrastructure process. Drilling may happen due to establishing ventilation shafts, to further define the value of the ore being mined underground, to define the mining path or to undertake exploration. All of these drilling activities are included in previous approved EMPs or authorisations. However, Lonmin would like to respond in stating that they do have drilling projects on going to define their	Company conduct and policy

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						<p>mining pathway, but also have. Therefore drilling is an activity which is continuous as the mine progresses. In addition, as part of their prospecting rights in and around our current Mining Right areas at WPL and EPL, drilling is an activity which is continuous to confirm the mine ore body for future mining requirements. Lonmin have over the last month mobilised surface exploration drill rigs within the prospecting areas north of the EPL Mining Right area. The process that Lonmin follows is consultation with the landowners and/or community before mobilization of drill rigs. Lonmin obtains signed approval before drilling commences. However, should this be done specifically during the phase when ownership or surface rights change from one landowner to the next or from Lonmin to the community, there might be a possibility that approval could have been delayed or obtained from previous landowners. The Environmental Management Plan obtained for Prospecting indicate that consultation needs to take place between the company prospecting (drilling) and the landowner/tenant of the land where the drill rig will be placed. Lonmin complies to the conditions of the EMP.</p>	
8	<p>After the construction of the tailings dams, will Lonmin take students and train and employ them in monitoring and managing the impacts of the projects? How will Lonmin ensure training of communities in this project?</p>	David Ramohawe	Wonderkop Land Claims Chairperson	19 March 2013	Focus group meeting with Wonderkop Sub Council	<p>At Lonmin's Environmental Stakeholder Forum meetings held on a 6-monthly base, the objective is also to provide awareness training to our nearby communities on the status of Lonmin's environment. During these forum meetings, Lonmin provides dedicated presentation slides to the stakeholders with a purpose to report environmental impacts and monitoring</p>	Company conduct and policy



Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						results as it relates to air quality, water, land and waste management. Dedicated slides on environmental impacts and suppression of dust from tailings are included as well. Lonmin will continue to use this Form also for community environmental awareness training.	
9	How did TD6 start and what was the process for placing it where it is now?	Lawrence Mmekwa	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	The construction of TD6 was approved by the Department of Minerals and Energy in 2001 under the Minerals Act of 1991, as an amendment to the Environmental Management Programme. At the time, the Chamber of Mines developed a Code of Practice for Mine Residue Deposits which was later adopted in the MPRDA and its supporting regulations. The location of the facility was determined as per the requirements of this legislation and the then Code of Practice.	Company conduct and policy
<b>2.3 EIA process</b>							
10	Which specialist studies will be undertaken during this EIA?	Mpho Magase	Madibeng Local Municipality (Environmental specialist: EIA's and Non-compliance)	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	Regulation 73 of the MPRDA Regulations specifically determines the areas of specialist studies to be undertaken. In addition, the following specialist studies are also under way: <ul style="list-style-type: none"> <li>• Air quality study</li> <li>• Biodiversity study</li> <li>• Heritage study</li> <li>• Ground water study</li> <li>• Surface water study</li> </ul>	EIA process
11	What is SRK Consulting's role in the process?	Motlana Mphoreng	Bapo Ba Mogale - Project Manager	15 March 2013	Focus group meeting with Segwaelane Sub Council	SRK Consulting has been appointed by Lonmin as the independent Environmental Assessment Practitioner to undertake the Environmental Impact Assessment and the Stakeholder Engagement Process. This is a	EIA process

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						legal requirement. SRK Consulting will assess potential impacts of the proposed project and present findings to the decision-making authorities. Stakeholder engagement will take place throughout the EIA process.	
12	It is very important that the community has access to Lonmin's Environmental Management Programme Report as this will show how Lonmin commits to addressing the impacts. When will the community have access to the EMPR?	David Ramohawe	Wonderkop Land Claims Chairperson	19 March 2013	Focus group meeting with Wonderkop Sub Council	Within an EIA/EMP legal process undertaken in terms of the MPRDA and NEMA, the community must be consulted within various stages of the process. The first stage of providing the community access to the documentation is with their input on the draft Scoping Report. The community will then again be provided access to the documentation when comment is required on the draft EIA/EMP Amendment document.	EIA process
<b>2.4 Groundwater</b>							
13	With the development of seepage what will the impact of the tailings dam after de-commissioning be on groundwater?	Khoabane Mofokeng	BPDM – Rural Development and Agriculture	19 March 2013	Focus group meeting with BPDM	Lonmin has committed to install a liner at the base of the return water dam and sections of the tailings storage facility (along rocky outcrops) to ensure that seepage does enter the groundwater resource. The liner design and specifications will be developed in alignment with the DWA's Best Practice Guidelines for Water Resource Protection and the final liner design will be approved by DWA's National Civil Design office. In addition to this, the entire base of tailings storage facility will be compacted and the design and lining of drainage system from tailings storage facility also ensures reduced volumes of seepage to ground water. Proposed de-commissioning objectives, which will be available in the final report, will also ensure reduced seepage to ground water.	Groundwater

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
14	At the end of life for the tailings dam, how will Lonmin monitor that seepage from rainwater does not contaminate groundwater?	Motlana Mphoreng	Bapo Ba Mogale - Project Manager	19 March 2013	Focus group meeting with Wonderkop Sub Council	Upon decommissioning of the tailings dam, the top and side slopes of the tailings dam will be rehabilitated to reduce the volume of rainwater ingress. Storm water controls will be implemented to divert clean storm water away from the tailings dam complex. Dirty storm water will be diverted and contained in the lined RWD and re-used in the process. The EMP also has specific requirements for regular water monitoring in closure to detect any impact on the groundwater resource. There are various strategies as part of our Integrated Water Management Plan that Lonmin is investigating to implement in the medium to long term in reducing and containing the potential pollution plume.	Groundwater
<b>2.5 Health, safety and security</b>							
15	How do we (Segwaelane) deal with contractors leaving areas unrehabilitated and unsafe, e.g. leaving holes in the ground after drilling	Abram Maginge	Bapo Ba Mogale TA – Segwaelane Sub Council	15 March 2013	Focus group meeting with Segwaelane Sub Council	All contractors working for Lonmin must comply with all applicable legislative requirements. Lonmin must comply with the conditions of the approved Environmental Management Plan Programme (EMP) for Prospecting received from the DMR. In addition to this an Environmental Standard for Drilling has been developed by Lonmin. Together with related procedures rehabilitation and closure of the site is strictly controlled. An assessment is made by before site establishment by the contractor, with photographic records. After drilling has been completed, a closure assessment is done by Lonmin Geology Projects and the environmental division and records kept for this purpose. Prospecting Performance Assessments are sent to the DMR as part of the legal conditions of the EMP, and these	Health, safety and security

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						documents with this documenting the rehabilitation undertaken at these sites.	
16	How will Lonmin ensure that once the tailings dam is de-commissioned, it will be safe and not pose any danger to the communities close to it, e.g. dust and groundwater?	Magdonia Masuku	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	With regard to safety and health, tailings dams are dedicatedly regulated to comply with the stringent requirements of the Mine Health and Safety Act, 1996. In terms of the MPRDA and according to mitigation measures identified in the approved EMP, dust and ground water monitoring will continue post-decommissioning. If dust levels or ground water contamination is identified Lonmin will be required to put measures in place to address these impacts. Closure will only be granted if residual impacts level are adequately managed. All decommissioned tailings storage facilities are grassed within a year of the date of decommissioning in order to reduce dust fallout. Ground water is continuously monitored and mitigation measures forms part of the Integrated Water Management Plan.	Health, safety and security
17	If an emergency e.g. a burst pipe happens, how will Lonmin respond to this in the short and long term?	Jan Kgomo	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	All safety emergency issues will be addressed in terms of the Mine Health and Safety Act, 1996. The approved EMP amendment must include measures for emergency and other procedures which are aligned with that in the Mine Health and Safety requirements. This includes amongst others frequent maintenance and surveying of the pipeline routes. There are also operational procedures for spill clean-ups and repairing of burst and broken pipelines. Lonmin ensures that all spills are cleaned up	Health, safety and security

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						as part of the auditing and ISO14001 EMS function.	
<b>2.6 Mining rights</b>							
18	What does having a mining right on land mean?	Motlana Mphoreng	Bapo Ba Mogale - Project Manager	15 March 2013	Focus group meeting with Segwaelane Sub Council	<p>In terms of South African Law, surface rights and mining rights held within such surface right are separated. Within this context, Surface rights means: the owner of the land still owns the surface of the land. Such an owner may undertake activities on the land in line with its zoning, such as farming or commerce. The surface rights owner however does not own any minerals that may be found on the land.</p> <p>Mining rights means: The holder of a mining right may extract the minerals on or underneath the surface of the land in question. The nature of a mining right is similar to providing the holder of the mining right with a "servitude" to access the property and to mine the minerals. The holder of the mining right must obtain agreement with the owner of the surface rights to enter his/her land to mine. In terms of latest legislation, the holder of the mining right must also ensures rezoning of land where surface infrastructure is to be established.</p>	Mining right

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
<b>2.7 Project specific issues</b>							
19	The community must keep the proposed project area open and guard against people moving into the area. It could compromise the project.	Motlana Mphoreng	Bapo Ba Mogale - Project Manager	15 March 2013	Focus group meeting with Segwaelane Sub Council	Lonmin cannot prevent or manage people settling informally around the mine if Lonmin is not the owner of the surface rights to the land. Lonmin can only prevent informal settlement on land for which it owns the surface rights. It should be realised that Lonmin was granted mining rights by Government and have that right to exercise our mining activities. People settling informally on a mining right area must also realise that it is done illegally, exposing themselves to safety risks. In their safety interest and protecting lives, Lonmin will therefore ensure that there is no informal occupation of its mining rights area.	Project specific issue
20	What are the risks associated with a tailings dam that reached end of life?	Joshua Mokoena	BPDM – LED	19 March 2013	Focus group meeting with BPDM	There is a decommissioning process to ensure the tailings facility is safe. Dust and ground water monitoring will continue. The facilities will be fenced to prevent access to people and cattle. Upon final closure, a risk report must be compiled to determine the residual and latent risks before the tailings dam is flattened and reshaped for final closure and rehabilitation.	Project specific issue - Closure
21	When will the construction of the tailings dams start?	Michael Mokate	Bapo Ba Mogale TA – Segwaelane Sub Council	15 March 2013	Focus group meeting with Segwaelane Sub Council	Although construction is proposed for May-July 2014 the environmental authorisation process still has to be undertaken and once Lonmin is granted the relevant environmental authorisations, construction may commence.	Project specific issue – Construction phase
22	Where exactly will the proposed tailings dams be located?	Petrus Makgabo	Madibeng Local Municipality – Ward Councillor – Ward 31	14 March 2013	Focus group meeting – Ward Councillors	The proposed dam will be located on the farm Middelkraal 466JQ, which Lonmin has surface and mineral rights to. The tailings dams will be located directly south of	Project specific issue – Location of project

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
					and Municipalities	existing Tailings Dam 6 on Lonmin Western Platinum (WPL). Lonmin will organize a site visit for the ward councillors and officials.	
23	Where are the new tailings dams in relation to the railway line and Segwaelane community?	Obed Mokomele	Bapo Ba Mogale TA – Segwaelane Sub Council	15 March 2013	Focus group meeting with Segwaelane Sub Council	The railway is in between tailings dam 8 and tailings dam 9. Tailings dam 8 is directly south of tailings dam 6 on Lonmin Western Platinum Mine. The Segwaelane community is located to the North East of the proposed project.	Project specific issue – Location of project
24	During the mining process, how does water get to the return water dam and how is it used from the dam?	Thabo Mogapi	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	Water is used to transport the tailings (like a mud stream) to the tailings facility. On the tailings facility, the excess water from the tailings is drained to the return water dam, and from the return water dam it is pumped back to the concentrator where it is re-used to transport tailings to the tailings facility.	Project specific issue – Return water
25	Can the water in the return water dam be used for human consumption?	Thabo Mogapi	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	Water in the return water dam contains contaminants from the tailings material deposited on the tailings dam and cannot be used for domestic purposes without proper treatment.	Project specific issue – Return water
26	What happens to the return-water?	Petrus Makgabo	Madibeng Local Municipality – Ward Councillor – Ward 31	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	The return water is pumped to the concentrator for re-use in transporting tailings to the tailings facility.	Project specific issue – Return-water
27	What are the alternative site options for the proposed tailings dams? How was this process undertaken?	Mpho Magase	Madibeng Local Municipality (Environmental specialist: EIA's and Non-compliance)	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	The site selection process and options are outlined in Section 2 of the Draft Scoping Report.	Project specific issue – Site selection

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
28	What is the future of Tailings Dams 3, 4 and 5?	Khoabane Mofokeng	BPDM – Rural Development and Agriculture	19 March 2013	Focus group meeting with BPDM	These dams will be decommissioned, grassed (to prevent dust fallout) and continuously monitored in terms of safety and environmental requirements until final closure.	Project specific issue - Sustainability
29	What is the gradient of the slope of tailings dam and how is it determined?	Mpho Magase	Madibeng Local Municipality (Environmental specialist: EIA's and Non-compliance)	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	For TD 8 and TD 9 the slope will be 1:3. This slope is based on the characteristics of the Lonmin tailings. It will promote rehabilitation and ensure safety of the walls of the dam..	Project specific issue – Tailings dam
30	What is the height of the tailings dam and how is it determined?	Mpho Magase	Madibeng Local Municipality (Environmental specialist: EIA's and Non-compliance)	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	The proposed height is 65m. The height is determined by specialist engineers to ensure the dam does not collapse/fail.	Project specific issue – Tailings dam
31	What restrictions are relevant at tailings dams?	Mpho Magase	Madibeng Local Municipality (Environmental specialist: EIA's and Non-compliance)	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	Access to TDs must be controlled and no person without a permit from the mine may have access since the tailings dams could pose a safety risk to that individual.	Project specific issue – Tailings dam
32	Can the tailings not be used in the local communities to for example make bricks or for agriculture?	Petrus Makgabo	Madibeng Local Municipality – Ward Councillor – Ward 31	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	The tailings must also meet certain requirements to be used for bricks to ensure the bricks are strong enough for building purposes. This has never been tested and could possibly be explored as a future project. etc.	Project specific issue – Use of tailings



Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
<b>1. Rehabilitation</b>							
33	Please explain how during the rehabilitation process, grass can grow on the barren tailings taking the difference between soil and tailings into account.	Petrus Makgabo	Madibeng Local Municipality – Ward Councillor – Ward 31	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	The grass does not grow naturally on tailings material. Growth enhancers such as compost and mulch are added to the tailings to create a growth medium for grasses. .	Rehabilitation
<b>2.8 Socio-economic</b>							
34	When construction of the tailings dams start in July 2014, how will local communities benefit in the process?	Petrus Makgabo	Madibeng Local Municipality – Ward Councillor – Ward 31	14 March 2013	Focus group meeting – Ward Councillors and Municipalities	The proposed project is a sustainability project, to maintain operation. There will be no additional long term job opportunities and contractor staff will be involved in the construction. Legislation requires that qualified persons be employed to construct and sign-off on the construction of the tailings dam Lonmin will keep ward councillors informed regarding future informal job opportunities.	Socio-economic
35	What will the communities benefit from the proposed project?	Michael Mokate	Bapo Ba Mogale TA – Segwaelane Sub Council	15 March 2013	Focus group meeting with Segwaelane Sub Council	The proposed project is a sustainability project, to maintain our mining operations in accordance with Lonmin's long term business plan thus ensuring long term operation of the mine and on-going employment of the current workforce.	Socio-economic
36	Are there opportunities for communities to benefit from this project? Example: is provision made for skills development in children to obtain construction skills; opportunities for internships or learnerships?	Joshua Mokoena	BPDM – LED	19 March 2013	Focus group meeting with BPDM	Perhaps not specifically from this project but it must be mentioned that Lonmin has an existing Community Development Programme focusing on community education, community health and local economic and enterprise development. Our Community Education Programme has 5 focus areas i.e. to develop and maintain local school infrastructure, to provide learner support, educator and parent support and to	Socio-economic

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						maintain our school nutrition programme. Lonmin's External Affairs Department is overall responsible for these programmes.	
37	BPDM has a Skills Development Programme and struggle to find opportunities for internships. What is the possibility of Lonmin assisting?	Khoabane Mofokeng	BPDM – Rural Development and Agriculture	19 March 2013	Focus group meeting with BPDM	Agriculture and rural development in this regard is not Lonmin's core business. However, opportunities as part of Lonmin's Social and Labour Plan may arise. This matter could be investigated by Lonmin's External Affairs Department.	Socio-economic
38	We appreciate the engagement with SRK and Lonmin. How do we link future co-operatives and SMME's into this project process?	Collins Sindane	Bojanala District Cooperatives Forum	19 March 2013	Focus group meeting with BPDM	The EIA/EMP amendment process provides an opportunity for communities to engage with Lonmin. As indicated, this specific project should not be seen or identified as an opportunity for future co-operatives or SMME. Lonmin has the existing Community Development Programme in place where one of the focus areas is local economic and enterprise development. Lonmin's External Affairs Department is responsible for identifying and developing such projects.	Socio-economic
39	What opportunities will there be for BPDM to integrate projects such as Lonmin is proposing into the Integrated Development Plan (IDP)?	Thabo Mashomo	BPDM Mining and Enterprise Development Coordinator	19 March 2013	Focus group meeting with BPDM	The Lonmin developments should fit within the IDP for the region. The EIA consultation process involves BPDM and local municipalities to ensure this specific project does not contradict the IDP for the region. Lonmin has also been invited as part of industry to participate in the Premier of NW's Development Strategy for the region. It is Lonmin's objective to align our Social and Labour Plan commitments and projects with that of the IDPs as well as with local municipality and provincial government initiatives.	Socio-economic

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
40	What employment and contract opportunities will there be for local communities?	David Ramohawe	Wonderkop Land Claims Chairperson	19 March 2013	Focus group meeting with Wonderkop Sub Council	<p>With the construction of tailings dams, legislation specifies that qualified persons be responsible for the construction of such dams. There will be contract opportunities for construction related to civil engineering, mechanical engineering and electrical engineering work. This work will be put out to tender and a minimum requirement would be the necessary skills and competencies required to undertake this highly specialised work.</p> <p>Companies who wish to tender for this project must be registered vendors with Lonmin and must have the qualifications and credentials to conduct the specified work.</p>	Socio-economic
<b>2.9 Stakeholder engagement</b>							
41	What will happen if the community does not want this project from Lonmin? What will the process be?	Michael Mokate	Bapo Ba Mogale TA – Segwaelane Sub Council	15 March 2013	Focus group meeting with Segwaelane Sub Council	<p>This project forms part of Lonmin's long term business plan to further execute our existing mining right. For such developments, stakeholder engagement is an integral part of the EIA process and a right recognised in the SA Constitution. During the EIA there will be various opportunities for stakeholders to register their concerns and issues regarding the proposed project.</p> <p>Stakeholders have the responsibility to ensure that their comments have been reflected and addressed fairly in the process (i.e. the Comment and Response Report and the EIA reports).</p> <p>When a decision is made by the Authorities stakeholders still have the opportunity to appeal against the decision in a process prescribed by the authorities. The reasons for objecting against the project must however be factual and relevant. Ultimately</p>	Stakeholder engagement

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
						the decision regarding whether the project may proceed or not lies with the authorities.	
42	What is the possibility of an educational tour for BPDM members of the portfolio committees to the project area, to obtain a better understanding of the project and Lonmin's operations?	Joshua Mokoena	BPDM – LED	19 March 2013	Focus group meeting with BPDM	Lonmin will facilitate such a tour outside of this process should an official request be received by the relevant party.	Stakeholder engagement
43	It is very important to understand the process that Lonmin is undertaking for this project. As Lonmin and SRK have informed us of the project, we have to inform the other portfolio committees and the Environmental Department. It is important the BPDM presents an intergovernmental perspective on the project throughout the process.	Joshua Mokoena	BPDM – LED	19 March 2013	Focus group meeting with BPDM	Thank you for the comment. Engagement with all the relevant authorities throughout the process is vital but access to the appropriate officials is a serious challenge. Assistance in this regard from the BPDM will be sincerely appreciated. SRK Consulting and Lonmin will follow up with BPDM to ensure that the correct officials are involved.	Stakeholder engagement
44	There is a bigger picture for Lonmin's relationship with BPDM. How does BPDM see this relationship?	Victor Tseka	Lonmin Stakeholder Engagement	19 March 2013	Focus group meeting with BPDM	BPDM is aiming to pull Rustenburg LM and Madibeng LM together in establishing a working relationship with Lonmin	Stakeholder engagement
45	How will the relationship between BPDM and Lonmin be taken forward?	Joshua Mokoena	BPDM – LED	19 March 2013	Focus group meeting with BPDM	Lonmin regard BPDM as a key stakeholder in the development of community and there will be a continuous engagement..	Stakeholder engagement
46	We would like to request a visit to the project area to understand the proposed project better?	Stephan Makaboge	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	Lonmin will facilitate such a tour outside of this process should an official request be received by the relevant party.	Stakeholder engagement

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
<b>2.10 Township expansion</b>							
47	The Segwaelane Sub Council proposed land to be earmarked for a future grave yard as well as youth development in the TD 8 area. This was discussed with Lonmin and must be taken into consideration in this project.	Abram Maginge	Bapo Ba Mogale TA – Segwaelane Sub Council	15 March 2013	Focus group meeting with Segwaelane Sub Council	Should these developments form part of formal township developments, then the Council will have to follow formal processes in terms of all applicable legislation in establishing these developments. Alternatively, such development projects could be considered in future to form part of Lonmin's Housing and Living Conditions Strategy or the Community Development Programme. However, these projects must be considered on merit and priority by the External Affairs Department for consideration.	Township expansion
48	We are not sure where the land is that has been earmarked for the grave yard and youth development. How will this project of Lonmin influence our process in Segwaelane.	Obed Mokomele	Bapo Ba Mogale TA – Segwaelane Sub Council	15 March 2013	Focus group meeting with Segwaelane Sub Council	Lonmin is the owner of the surface rights for the development of TD 8 & 9. This project forms part of Lonmin's long term business plan to sustain our operations and execute the our mining right. The proposed graveyard and youth development does not form part of developments within this specific site.	Township expansion
49	The visit to the project area is critical as we need to understand exactly where the project will happen. Lonmin needs to disclose where their future tailings dam expansion will take place. This impact township development and village population significantly. How will Lonmin take the expansion of the Wonderkop Township into consideration in this project?	David Ramohawe	Wonderkop Land Claims Chairperson	19 March 2013	Focus group meeting with Wonderkop Sub Council	Site inspection will be arranged for members to have a clear view where the proposed project will be located. Township development and expansions falls pat of the Local authorities jurisdiction and must follow a separate EIA process in itself in terms of all the applicable legislation and ordinances to authorise formal township developments and expansions. As an I&AP, Lonmin is not aware of a legal processes by Madibeng for the expansion of Wonderkop Township.	Township expansion

Nr	Comment/Question	Commentator	Organisation	Date	Source	Response	Category
50	Exactly where are TD8 and TD9? How did TD6 start and what was the process for placing it where it is now? The area across the Maretswana river, north of TD 6 has compromised the expansion of the township. The expansion of the tailings dams is infringing on our grazing land and the growth of the township.	Lawrence Mmekwa	Bapo Ba Mogale TA – Wonderkop Sub Council	19 March 2013	Focus group meeting with Wonderkop Sub Council	<p>The construction of TD6 was approved by the Department of Minerals and Energy in 2001 under the Minerals Act of 1991, as an amendment to the Environmental Management Programme. The location of the facility was determined as per the requirements of this legislation, the geographical selection criteria and to ensure it remains within the mining rights of the mine.</p> <p>The proposed dams will be located on the farm Middelkraal 466JQ, which Lonmin has surface and mineral rights to. The tailings dams will be located directly south of existing tailings dam 6 on Lonmin Western Platinum Mine (WPL). Lonmin owns the land where the planned expansion will take place and will communicate with the community as to where grazing will be able to take place in the future.</p>	Township expansion

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